



**Esere J. Onaodowan, Esq.**

eonaodowan@gmail.com c 718.427.3139

**Christine Delince, Esq.**

cdelince@eocdlaw.com c 917.238.9332

Via ECF

Hon. Gregory H. Woods  
United States District Court Judge  
Daniel Patrick Moynihan Courthouse  
500 Pearl Street  
New York, NY 10007

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: 5/5/2023

Re: United States v. David Glover 22 Cr. 522 (GHW)

Dear Judge Woods:

## MEMORANDUM ENDORSED

I represent David Glover in the above referenced indictment. Mr. Glover is currently on home incarceration. Mr. Glover would like to start working to help support his two children, however he is not allowed to work while on home incarceration. We therefore respectfully request that Mr. Glover's bail conditions be modified to home detention.

Additionally, Mr. Glover's New York State Identification has expired, and he must therefore go in person to the Department of Motor Vehicles ["DMV"] to renew it. We are therefore also asking that Mr. Glover's bail conditions be modified to allow him to travel to the College Point DMV, located at 30-56 Whitestone Expressway, Queens, NY 11354, on May 9, 2023, from 11am to 5pm to renew his New York State Identification.

I have consulted with the government, and they defer to Pretrial. I have consulted with Mr. Glover's Pretrial officer Jonathan Lettieri, and he has no objection to either bail modification request.

NEW YORK, NEW

DATED: YORK May 4, 2023

RESPECTFULLY SUBMITTED,

Christine Delince, Esq.

Application granted in part and denied in part. This application does not provide sufficient justification for a modification of the defendant's home incarceration condition. It does not support a finding that the need to protect against risk of flight or danger to the community and other people has changed since the Court's imposition of the conditions of the defendant's pretrial release. The defendant may travel to the College Point DMV at the address indicated in this letter to renew his New York State identification. The defendant must inform his pretrial services officer of the date and time of his trip, and before leaving his home must obtain the pretrial services officer's express approval. The defendant must travel directly to the DMV and return directly from it. He may not deviate from the route or make intermediate stops. He must inform the pretrial services office upon his return. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 154.

SO ORDERED.

Dated: May 5, 2023  
New York, New York

  
GREGORY H. WOODS  
United States District Judge